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July 30, 2004

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Written *Ex Parte* Presentation in MB
Docket No. 03-185 – Comments in
Support of U.S. GPS Industry Council

Dear Ms. Dortch:

The National Translator Association (“NTA”) has had a series of conversations with the U.S. GPS Industry Council (“the Council”) concerning the protection of the GPS bands by digital LPTV and TV translator stations. On July 26, 2004, the Council filed *ex parte* comments in Docket No. 03-185.

The NTA agrees that protection to BPS receivers is important. We therefore recommend that the FCC adopt the request of the United States BPS Industry Council and include the following provisions in the Rules for digital LPTV and TV translator stations:

In addition to the harmonic limits set by the emission mask, specific “Out Of Band” protection must be provided in the frequency ranges corresponding to the GPS Bands: L5 (1164 – 1215 MHz); L2 (1215 - 1240 MHz) and L1 (1559 - 1610 MHz). This special requirement applies specifically to digital LPTV and translator stations operating on channels 22 - 24, 36 - 38, and 65 - 69.

1) A type certified transmitter specifically certified for use on one or more of the above channels must include output filtering with an attenuation of 85 dB below the passband and this attenuation must be demonstrated as part of the certification application.

2) For an installation on one of the above channels with a digital transmitter not specifically type certified for the channel, a low pass filter or equivalent device rated by its manufacturer to have an attenuation of at least 85 dB below the passband of the operating channel must be installed in a manner that will prevent

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the harmonic content from reaching the antenna. A description of the low pass filter or equivalent device with the manufacturer's rating or a report of measurements by a qualified individual shall be retained with the station license. Field measurements of the second or third harmonic output of a transmitter so equipped are not required.

Respectfully submitted,

NATIONAL TRANSLATOR
ASSOCIATION

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